drop down menu from Terry
data for IFF/FSDS reference sheet guide

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Response to Comment

1075513 - R8 SDMS

CDM Comments to the Draft Troy Asbestos Property Evaluation Work Plan
February 10, 2006

SITE/O.U. LBAS - Troy OU
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Comments compiled from CDM.

General Comments

Vermiculite-containing building materials (e.g., plaster, concrete, chinking, etc.) should be included in the investigation process. These are potential sources of LA.

A discussion about a practice period to evaluate sampling techniques and background data is lacking. A subset of quality control and field samples should be analyzed in order to quickly evaluate field techniques. Focused and limited analysis will improve the field sampling learning curve in the beginning. How is this done w/ local lab? - yes direct

The schedule assumptions are very aggressive. Anticipating cooperation from 75 homeowners per week may not be reasonable, particularly in the first month where the learning curve is greatest.

Collecting property specific design information (PDI) during the TAPE is a good approach. However, this will significantly slow the screening process. A thorough interior PDI followed up with detailed sketches, etc. can take up to 6 hours per properly to complete.

Analytical turn-around time will be based on available funding. The CDM laboratory coordinator anticipates that only $200k may be available for analyses, or about 10% of the collected samples.

Due to the need for defensibility of documentation, reviews/audits of field documentation for completeness, consistency, and accuracy of responses should be incorporated.

All field forms, including access agreements and field sample data sheets (FSDSs) should be included in an Appendix.

The Libby information field forms (IFFs) contain data fields that are required to be captured (and subsequently entered into Libby V2) as deemed by EPA and its risk assessors. At a minimum, these fields need to be retained on the TAPE inspection form; the exact fields can be verified with Volpe.

The electronic Libby Asbestos Sample Tracking Information Center (eLastic) data entry SOP should be referenced. Denver said Tterill not to in eLastic

The electronic chain-of-custody (eCOC) SOP should be referenced. but that is CDM

References to analytical methods (e.g., ASTM 5755D-03) need to be updated.

Due to Libby V2 data configurations, sample IDs must contain a 2-digit prefix (can be alpha-numeric) followed by a 5-digit sequential number. Also, location IDs must contain a 2 digit prefix followed by a 6-digit sequential number. It is recommended that Tetra

Tech and Volpe meet to discuss Libby V2 data entry requirements before any documents are finalized.

Specific Comments

Section 1.1, third sentence: This sentence mentions ingestion as an exposure pathway and references Figure 1-1; however, Figure 1-1 does not address ingestion.

Section 2.0, second paragraph, last sentence: Analytical laboratories for the Libby site are contracted by CDM. As such, CDM oversees laboratory schedules and tracks receipt of electronic and hard copy data deliverables.

Key Personnel table: Add CDM Data/Sample Coordinator so that their responsibilities are clear. Terry?

Section 2.2, last paragraph (following personnel table): How does Tetra Tech plan to provide the property owner with a sample receipt at the time of collection? Will this be QC'd data? EPA has made it policy to only provide data that has been reviewed for completeness and accuracy. Send Jeff a sample receipt

Strike "sample results may take weeks or months to obtain" in the event that sample analysis takes months or even longer. Property owners will call if they expect information by a certain time, which can be mitigated by being up front with the public about funding limitations.

EPA does not offer a split sample program for the public in Libby due to the issue of variability in split sample results and the question of what data will be used for remediation decisions. [Example: a property owner's sample is positive for LA but the government sample is non-detect; what is the remediation decision?]

DQO, Table 3-1 Comments:

Step 2: Sampling Decisions: Maybe use county property tax information for parcel ownership, distribution, etc. noted in Step 7

Step 2: Cleanup Decisions: Include driveways.

Step 3: Include walls, crawlspaces, etc. Inspect for vermiculite-containing building materials. Will owner interview data be used to trigger sample collection (e.g., dust sample) and/or make cleanup decision (i.e., asbestos-related disease [ARD], former mine worker?). NO -

Step 5, first bullet: consider changing "living spaces" to building level (i.e., basement, ground floor, finished attic, etc. Second bullet: This implies that all buildings will be dust sampled regardless if LA source on a property or not. Consider dust sampling buildings only if a)VCI and/or vermiculite building material present, as previous bullet, b)LA source outside is present (i.e., vermiculite in SUA, yard) or 3)if secondary source present (ARD, former mine worker, etc.). Fifth bullet: Current protocol is if vermiculite is present in SUA, it is marked for removal. but not any more

Step 7: Second bullet: ...Libby Asbestos Superfund Site, *OU4*.

Figure 3-3: EPA has approved the use of FSDSs in lieu of field chain-of-custody records to accompany samples from the samplers to the data entry staff member. CDM suggests that Tetra Tech review current Libby sample custody procedures as a potential time saving and data integrity mechanism (less data entry, less room for transcription errors, etc.).

Libby CSS field QC samples consisted of field equipment blanks, rinsate blanks for soil sampling equipment (which were evaluated and later not required to be collected), field duplicates for soil, dust lot blanks, and dust field blanks. It should be discussed with EPA (Mary Goldade) if rinsate samples should be collected in Troy, given that they may want to see data confirming adequate decon practices. Note that dust lot blanks are collected at 1/50 cassettes to confirm the cassettes are asbestos free.

Section 4.0: Add 'driveway' to bullet number 5.

Section 4.1: After reviewing section 4.1, there is not enough information to evaluate the scope of Tetra Tech's H&S approach. Depending upon the number of people that will be performing sampling and investigations, it is not necessary for all individuals to have inspector certifications. Suggest only the team lead has this certification. Over a two year investigation program, there would be significant costs associated with maintaining the certifications. Ensure proper material handling and packaging for all samples coming into the CDM sample coordinator. Also, what is the plan for spent investigation PPE?

Section 4.2.1, second paragraph: Although a positive offering to the community, allowing property owners or interested parties to stop by the Tetra Tech field office to discuss issues and obtain information will greatly interfere with the quality and timeliness of data/sample coordination staff tasks. We recommend that you direct them, via the 1-800 number, to the Information Center.

Section 4.2.2.4, bullet points pertaining to packets: How will property-specific forms and labels be prepared before visiting the property? That is, it will not be known how many samples of each type will be collected, or how many buildings will be sampled. Paperwork may be prepared that will not be used and vice versa. This is problematic since it is expected that sampling paperwork will be numbered.

In addition to signed-out sample labels, signed-out Location ID labels should be taken to the inspection.

Will logbooks also be part of the documentation? If so, please add.

Section 4.4.1, first paragraph: Ensure TAPE field team verifies presence/absence of vermiculite. That is, don't take owners word. Make sure each field team has proper, detailed PPE don/doff procedures for attic entry, especially for interior accesses. Also, ensure every TAPE field team is equipped with a HEPA vacuum. It will be useful should small-spills occur during investigation ingress/egress. During inspections, take note of structural integrity, mold, and/or attic venting concerns.

Section 4.4.1, second paragraph: Suggest using a drill and scope to verify presence/absence of vermiculite behind walls with no outlets/fixtures.

Section 4.4.1, third paragraph: It will also be necessary to use a non-conductive extension ladder.

Section 4.4.1, fifth paragraph: These details are probably only necessary on buildings with vermiculite and/or other source materials. Inspect for vermiculite-containing building materials (as mentioned in General Comments). Collect bulk PLM if friable, include SOP.

Section 4.4.1, ninth paragraph: Secondary structures will be inspected and details recorded on a Secondary Information Field Form (SIFF). Secondary structures should be dust sampled if exterior sources (e.g, vermiculite in SUA) are observed.

Section 4.4.1.2: The location IDs should have a 5-digit number, example BD-XXXXX.

Section 4.4.2, first paragraph: Per current Libby project protocol, primary structures are only dust sampled if a)primary sources of LA on property (e.g., VCI, LA in soil, vermiculite in SUA) and/or b)secondary sources are present (e.g., ARD, mine worker, or close proximity to significant source). Also, secondary structures dust sampled also if exterior sources are present. Note D5755-95 is referenced, but D5755-03 is included in the Appendix B.

Section 4.4.2.1, Primary buildings: Current Libby project protocol is to *not* collect dust samples on levels with significant vermiculite present. This triggers an interior cleaning. However, if the leakage is localized, a *small-scale vermiculite removal* dust sample is collected in proximity to release. High-traffic dust sample aliquots should not come from rugs, mats, or other frequently replaced floor coverings. Secondary buildings: If any samples are collected from a secondary building, the building should be assigned an SIFF, BD number, and collect GPS point.

Section 4.4.2.2, second paragraph: The lab will provide 50-count boxes of dust sample cassettes. These cassettes already come with a 45-degree cut tubing. Individual baggies must be purchased separately. Ensure lot blanks are submitted and analyzed.

Section 4.4.2.2, fifth paragraph: Three-aliquot sample collection is current Libby project protocol, but should be mentioned this is a deviation from D5755, which specifies one specific point. Caps (provided with cassettes) should be returned to the cassettes prior to bagging. Since these samples are hand-delivered, it is not necessary to wrap them in bubble-wrap.

Section 4.4.3, second paragraph: The field sketches should include improvement features, access points (for removal contractor), and detailed description of flowerbed borders, yard items, and landscaped area (e.g., type of rock, etc.). Note some yard areas will be shared by two addresses. This should be clearly described on the IFFs if multiple BD numbers.

Section 4.4.3, fourth paragraph, last sentence: It is highly recommended that visual inspections do include some type of intrusive measures. Use a trowel to turn the soil surface over in select areas. If vermiculite is present in an SUA, it should not be assumed that it will be present at the soil surface.

Section 4.4.4.2, fifth paragraph: A modification to the Libby project protocol was written to recommend homogenizing of soil samples be performed in the sample bag. This would eliminate the need for a stainless-steel bowl.

Disposable towels?

Section 4.4.4.3, first paragraph: The GPS point should be collected in a central location of the 5-point composite sample. Also the location point should be 5 digits. The prefix identifier can only be 2 digits, such as TS-XXXXX for Troy Sample, or similar.

Section 5.1, first paragraph: It is not necessary to replace tubing between the low-volume pump and cassette between each sample. Additionally, the laboratory-provided cassettes will come with 45-degree ends.

Section 5.1, second paragraph: The cassettes typically come with a 100 cm2 template, which are disposed of between each sample.

Section 5.1, third paragraph: See comment to Section 4.4.4.2. Distilled or demonized water should be used.

Section 5.2: Refer to comments on QC samples stated above for Figure 3-3. Dust lot blanks are prepared by field staff at a frequency of 1 lot blank per 50 unused sampling cassettes for both air (for negative exposure monitoring) and dust cassettes. Refer to Libby documentation for lot blank preparation procedures. Dust lot blank data will determine the usability of the batch of unused sampling cassettes.

So sent before box used?

Equipment blanks are analyzed by PLM-9002 at the EMSL lab in Libby. Please reference the analytical method and lab. Also, details should be included for sending initial equipment blanks for analysis to ensure proper decontamination techniques are being employed, and that those habits are carried out for the duration of soil sampling.

Section 5.5, second paragraph: The property and sample information entered in the field into eLastic from the IFFs and FSDSs, respectively, is partial, that is only the tracking information needed by field staff is entered and checked. Therefore, Volpe will need hard copies of all sample project documentation to complete sample data entry into Libby V2, and to maintain a backup record. Verify shipping frequencies with Volpe (perhaps weekly).

Section 5.5, third paragraph: Electronic data will not be transferred between Tetra Tech and CDM, rather, the records will be accessed using the eLastic application, which relates to a single Access database to be maintained on one of the Tetra Tech field office computers. Also, the data transfer happens after the samples are placed on a COC because the export feature in eLastic bundles sample and COC data in one step.

but the COC exists in eLastic

Section 5.5, fourth paragraph: Per current Libby project protocol and due to the features of eLastic, there may be no need for Tetra Tech to produce COC forms. Again, FSDS serve as records of custody and may be kept with samples in storage until a COC form is generated from eLastic. FSDSs are reviewed sample entry by sample entry to ensure that all samples collected are accounted for and represented on an FSDS.

Section 6.1, first paragraph: Volpe oversees uploading of data into Libby V2.

Section 7.2, second paragraph, first sentence: change "EPA's" to "the project's".